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May 7th, 2024

Via CM/ECF

The Hon. Judge Nicholas G. Garaufis
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: KEITH ALAN RANIERE v. UNITED STATES OF AMERICA
Case Nos. 1:24-CV-02925 & 1:18-CR-00204
Request for Extension of Time to Amend Pro Se Motion to Vacate
Under 28 U.S.C. § 2255

Dear Hon. Judge Garaufis:

My office was retained yesterday to represent Keith Alan Raniere (“Mr. Raniere”) solely in his 2255 application, which was filed on April 17th, 2024, pending before Your Honorable Court. Pursuant to Fed. R. Civ. P. 15(a)(1)(A), the deadline to amend Mr. Raniere’s filing without leave of Court or consent of The United Attorney’s Office is tomorrow, May 8th, 2024.

Given the voluminous nature of this matter, the material edits that will need to be made to the 2255 filing and the magnitude of the record, I am respectfully requesting a ninety (90) day extension to amend to Monday, August 5¹. I have briefly conferred with Deputy Chief Nicholas J. Moscow, who is handling this matter, and the Government is not taking a position on this request.

Further, it is my understanding that securing legal visits and calls with Mr. Raniere is challenging and are not readily available. Prior to making a submission on his behalf, I will need to meaningfully confer with him and having additional time to do so will be greatly appreciated.

¹ Upon information and belief, the 2255 action could have been filed on or prior to January 9, 2025 given recent disclosures (Doc. 1231) made by the Government and this further supports the instant request.

I can best be reached on my mobile phone, (845) 304-5312 or through email, deborah@deborahjblum.com. Thank you in advance for your consideration.

Very truly yours,

A handwritten signature in black ink that reads "Deborah J. Blum". The signature is written in a cursive, flowing style.

Deborah J. Blum

Via Email and Facsimile
cc: Joseph Reccoppa
Courtroom Deputy to
The Hon. Judge Nicholas G. Garaufis

Via Email
Nicholas J. Moscow, Esq.
Deputy Chief, Criminal Appeals
United States Attorney's Office for The Eastern District of New York